

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

---

ANDRE BISASOR,  
Plaintiff

Vs.

CASE NO.: 1:23-CV-00374-JL

CRAIG DONAIS, RUSSELL HILLIARD,  
DONAIS LAW OFFICES PLLC,  
UPTON AND HATFIELD LLP and  
MARY K. DONAIS,  
Defendants

---

**DEFENDANTS CRAIG S. DONAIS, MARY K. DONAIS  
AND DONAIS LAW OFFICES PLLC'S  
RESPONSE TO PLAINTIFF'S MOTION FOR HEARING  
ON THE DEFENDANTS' MOTION TO DISMISS (DOC. 116)**

NOW COME the Defendants Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC (jointly the “Donais Defendants”) and respond to Plaintiff Andre Bisasor’s (“Plaintiff”) Motion for Hearing on the Defendants’ Motions to Dismiss (Doc. 116). The Donais Defendants take no position on whether this court holds a hearing on the pending motions to dismiss.

However, to the extent that Plaintiff implies that oral argument is mandatory or that it will assist the court, the Donais Defendants disagree. Plaintiff contends that due to his pro se status and the complexity of the legal issues, that it is “proper to hold a hearing” and a “hearing will benefit this court.” (Doc. 116, ¶¶ 13, 16.) Given the extensive briefing that has already occurred, it does not appear that oral arguments will assist the court.

Again, though, the Donais Defendants take no position on whether this court should permit oral argument.

Respectfully submitted,

FOR THE DEFENDANTS,  
CRAIG DONAIS, DONAIS LAW OFFICES  
PLLC and MARY K. DONAIS

*/s/ Linda M. Smith*

---

Edwin F. Landers, Jr., #17297  
[elanders@morrisonmahoney.com](mailto:elanders@morrisonmahoney.com)  
Linda M. Smith, #265038  
[lsmith@morrisonmahoney.com](mailto:lsmith@morrisonmahoney.com)  
Center of New Hampshire Office Tower  
650 Elm Street, Suite 201  
Manchester, NH 03101  
(603) 622-3400

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing **OBJECTION** to all parties in this action by serving same via electronic mail to:

Andre Bisasor, Pro Se  
679 Washington Street, Suite #8-206  
Attleboro, MA 02703  
[quickquantum@aol.com](mailto:quickquantum@aol.com)

William Saturley, Esq.  
Daniel R. Sonneborn, Esq.  
Preti Flaherty  
60 State Street, Suite 1100  
Boston, MA 02109  
[wsaturley@preti.com](mailto:wsaturley@preti.com)  
[dsonneborn@preti.com](mailto:dsonneborn@preti.com)

Date: November 29, 2023

*/s/ Linda M. Smith*

Linda M. Smith